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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

1 I, Archith Ramkumar, declare:

2 1. I am a Trial Attorney at the Office of Immigration Litigation District Courts
3 Section of the United States Department of Justice, and am assigned to represent Defendants in
4 this action. The facts set forth in this declaration are within my personal knowledge or based on
5 documents and information I have received in the course of this litigation in this case.

6 2. Plaintiffs in this lawsuit are challenging the implementation of the Migrant
7 Protection Protocols (“MPP”), *see* Complaint, Dkt No. 1, and, in their Motion for a Temporary
8 Restraining Order (“TRO”) contend that certain documents relevant to the Individual Plaintiffs
9 have not been filed. *See* Dkt. 20-1 at 6. Defendants seek to submit excerpts of the individual
10 Plaintiffs’ Alien Files (“A-Files”) solely to advance Defendants’ jurisdictional arguments as well
11 as to rebut the evidence submitted by Plaintiffs to show irreparable harm.

12 3. Each A-File contains personal and confidential identifying information belonging
13 to the individual Plaintiffs, and also catalogues interviews conducted by the Department of
14 Homeland Security and asylum officers of the individual Plaintiffs. These interviews also
15 contain sensitive, protected identifying information.

16 4. In addition, the individual Plaintiffs are proceeding in this lawsuit
17 pseudonymously, *see* Dkt. 4. It is therefore necessary to file the A-Files under seal to remain
18 consistent with Plaintiffs’ motion to proceed pseudonymously. As such, the A-Files that are the
19 subject of this motion are replete with information that must be protected from public disclosure.

20 5. Plaintiffs’ Counsel agrees that the information contained in the excerpts of the A-
21 Files should be protected from disclosure and filed under seal.

1 I declare under penalty of perjury that the following declaration is true and correct.
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3 Executed at Washington, D.C. on March 1, 2019.

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/s/ *Archith Ramkumar*
ARCHITH RAMKUMAR